


May 3, 2022

By ECF

The Hon. Naomi Reice Buchwald
United States District Court for the Southern District of New York
500 Pearl Street
New York, New York 10007

Application denied. The conference will take place as scheduled.

SO ORDERED.



NAOMI REICE BUCHWALD
UNITED STATES DISTRICT JUDGE

Dated: New York, New York
May 4, 2022

Re: *Araneta v. JPMorgan Chase Bank, N.A.*, No. 1:22-cv-02346 (NRB-OTW)

Dear Judge Buchwald:

I write as principal trial counsel in this matter for defendant JPMorgan Chase Bank, N.A. (“Chase”) to respectfully request an adjournment and rescheduling of the initial conference currently set for Monday, May 9, 2022, at 1 p.m. I am also representing the defendants in a four-week jury trial currently ongoing before the Honorable Lorna G. Schofield (in *US Airways v. Sabre Holdings Corp., et al.*, No. 1:11-cv-02725 (S.D.N.Y.)). Voir dire and witness testimony in that case commenced on April 22 and April 25, respectively, and testimony is expected to continue through the week of May 16.

The parties’ earliest shared availabilities after the trial is expected to conclude are:

Wednesday, May 25, between 3 and 4 p.m. ET
Thursday, May 26, any time after 3 p.m. ET
Friday, May 27, any time after 11 a.m. ET
Wednesday, June 8, any time between 1:30 and 4 p.m. ET

Plaintiffs do not consent, however, and respond as follows:

Plaintiffs both are in their late 80’s and moving this case along is a material concern to them and their counsel. Defendant’s counsel is one of the largest law firms in the country with close to 1,000 lawyers. With all those attorneys, and in light of the Plaintiffs’ advanced ages, Plaintiffs do not consent to a one month adjournment, and leave it to the Court to decide if the extension is warranted given these facts.

This is the first request from either party for an adjournment or extension of any date in this matter and does not affect any other scheduled dates (as there currently are none). In addition, and as Chase represented to Plaintiffs’ counsel in making this request, Harry Koulos, the undersigned associate attorney, can begin meeting and conferring with Plaintiffs in the meantime on the matters specified in Your Honor’s April 25 order.

Respectfully submitted,

SKADDEN, ARPS, SLATE,
MEAGHER & FLOM LLP

By: /s/ Boris Bershteyn
Boris Bershteyn
Harry P. Koulos
One Manhattan West
New York, NY 10001
Tel.: (212) 735-3000
Fax: (212) 735-2000
boris.bershteyn@skadden.com
harry.koulos@skadden.com

Counsel for Defendant
JPMorgan Chase Bank, N.A.